

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**UNITED STATES OF AMERICA ex rel.  
TIFFANY MONTCRIEFF, ROBERTA  
MARTINEZ, and ALICIA BURNETT,**

Plaintiffs,

vs.

**PERIPHERAL VASCULAR  
ASSOCIATES P.A.,**

Defendant.

Civil Action No. SA-17-CV-00317-XR

**RELATORS' PROPOSED VOIR DIRE**

Relators Roberta Martinez, Alicia Burnett, and Tiffany Montcrieff hereby submit their proposed questions to ask the prospective jurors.

**PROPOSED VOIR DIRE QUESTIONS**

1. Full Name
2. Age
3. Place of Birth
4. How long have you lived in Bexar County?
5. Other cities/ states/ countries where you have lived?
6. What is your marital status?
7. How many children do you have?
8. What is the highest grade you completed?
9. What do you enjoy doing in your spare time?

10. Please list television news programs, radio news programs, newspapers, magazines, professional journals, or websites to which you subscribe, regularly read, watch, or listen to.
11. If you watch television, what are some of your favorite shows?
12. Where are you currently (or most recently) employed?
  - a. Length of Employment
  - b. Job Description / Title
13. Please list any areas in which you have special knowledge, training, or experience
14. Have you ever served on a jury?
  - a. Civil or criminal?
  - b. Did you reach a verdict?
15. Have you testified in court or at a deposition?
16. Have you or any family member ever worked in the legal field?
  - a. If yes, in what field, where, and for how long did you or your family member work?
17. Have you or any family member ever worked in healthcare?
  - a. If yes, what field, and position?
  - b. Has anyone ever worked as a technician in the medical field?
  - c. Has anyone ever worked in the medical laboratory industry?
  - d. Has anyone ever worked in the x-ray industry?
18. Does anyone have specialized knowledge or training with respect to the United States Medicare program?
19. Does anyone have specialized knowledge or training in economics, bookkeeping, or accounting?
20. Has anyone ever worked for the government?
21. Does anyone own a business?
22. Does anyone work in compliance?

23. If the evidence showed that the damages were in the millions or tens of millions of dollars, could you award it?
24. Does anyone believe that there are too many lawsuits?
25. Does anyone have strong feelings about the civil justice system?
26. Has anyone ever been a plaintiff or defendant in a lawsuit?
27. Does anyone have strong feelings about whistleblowers?